

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE AMERICAN BUSINESS)
FINANCIAL SERVICES INC.)
NOTEHOLDERS LITIGATION) Master File No. 05-232
)

**PLAINTIFFS' MOTION FOR AN ORDER TO APPROVE DISTRIBUTION
OF THE SETTLEMENT FUND**

Plaintiffs, by their counsel, hereby move this Court for entry of the accompanying proposed Distribution Order, approving distribution of the Net Settlement Fund *pro rata* to authorized claimants, allowing late-filed claims, disallowing rejected claims, approving the payment of settlement administration fees and costs from the Settlement Fund, approving settlements with SPCP Group, LLC and Hain Capital, approving the payment of monies remaining after such payments (and any additional administrative expenses) to a charitable organization(s), approving Heffler's ultimate destruction of documents, and confirming releases contained in the Settlement Agreement, the Proof of Claim form and the Court's order of November 21, 2008, as further explained in the accompanying memorandum.

Dated: January 21, 2010

Respectfully,

/s/ TODD S. COLLINS
Todd S. Collins (TSC4390, I.D. No. 29405)
Elizabeth W. Fox (EWF6692, I.D. No. 33456)
Neil F. Mara
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-5715
tcollins@bm.net

THE NICHOLAS J. GUILIANO LAW FIRM
Nicholas J. Guiliano
1500 Walnut Street, Suite 1100
Philadelphia, PA 19102
Telephone: 215-413-8223
Facsimile: 215-413-8225
njgesq@aol.com

JACOB A. GOLDBERG, ESQ., LLC
Jacob A. Goldberg
P.O. Box 30132
Elkins Park, PA 19027
(215) 782-8235
jacobagoldberg@comcast.net

KLAFTER & OLSEN
Kurt B. Olsen
Jeffrey A. Klafter
2121 K St., N.W.
Suite 800
Washington, D.C. 20037
(202) 261-3553
ko@klafterolsen.com